

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

STEPHEN McCOLLUM, *et al.*,

Plaintiffs,

vs.

BRAD LIVINGSTON, *et al.*,

Defendants.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. 4:14-CV-03253

Joint Motion to Extend Deadlines and Stay Discovery

The Parties jointly file this motion to extend all case deadlines as set forth in the scheduling order, including all pending motions and responses, and to stay all discovery for **seventy-five (75) days** from any previous deadlines, to include all deadlines from January 31, 2018 forward. The parties have reached a preliminary settlement agreement for this case and the related cases pending before the Court. The preliminary settlement is subject to multiple levels of approval, including approval from the Attorney General, the Governor, the Comptroller, and others. The parties anticipate that the settlements will be approved following completion of the process. The parties request that deadlines be extended and discovery stayed so that they may work through the settlement process.

The Parties respectfully request all proceedings and discovery in this case be stayed and deadlines extended for seventy-five days from any previous deadline in place as of January 31, 2018. As settlements become final in this and the related cases, the parties will notify the Court and will file a motion to dismiss the case. Within seventy-five days, the parties will notify the Court of the status of any remaining cases in which the settlement process is not complete.

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

JEFFREY C. MATEER

First Assistant Attorney General

BRANTLEY STARR

Deputy First Assistant Attorney General

JAMES E. DAVIS

Deputy Attorney General for Civil Litigation

LACEY E. MASE

Assistant Attorney General

Chief, Law Enforcement Defense Division

/s/ Leah O'Leary

LEAH O'LEARY

Assistant Attorney General

Lead Attorney

Texas Bar No. 24079074

Southern District ID No. 1563191

Leah.OLeary@oag.texas.gov

LAW ENFORCEMENT DEFENSE DIVISION

P. O. Box 12548, Capitol Station

Austin, Texas 78711

Phone: (512) 463-2080

Fax No.: (512) 370-9918

**ATTORNEYS FOR TDCJ AND TDCJ
INDIVIDUAL DEFENDANTS**

/s/ Shanna Elizabeth Molinare

SHANNA ELIZABETH MOLINARE

Attorney-in-Charge

Assistant Attorney General

Texas Bar No. 24041506

Southern District ID No. 38632

shanna.molinare@oag.texas.gov

Law Enforcement Defense Division

P. O. Box 12548, Capitol Station

Austin, Texas 78711

Phone: (512) 463-2080 , Fax: (512) 370-9814

GRAIG J. ALVAREZ

State Bar No. 06934340

Federal I.D. No. 22596

Graig.Alvarez@asb.legal

KARA STAUFFER

State Bar No. 24001647

Federal I.D. No. 685342

Kara.Stauffer@asb.legal

ALVAREZ STAUFFER BREMER PLLC

815 Walker Street, Suite 1450

Houston, TX 77002

Phone: (713) 351-0300

Fax: (713) 351-0320

ATTORNEYS FOR UTMB

/s/ Jeff Edwards

JEFF EDWARDS

State Bar No. 24014406

Lead Counsel

SCOTT MEDLOCK

State Bar No. 24044783

DAVID JAMES

State Bar No. 24092572

MICHAEL SINGLEY

State Bar No. 00794642

EDWARDS LAW

The Haehnel Building

1101 East 11th Street

Austin, Texas 787002

Phone: (512) 623-7727

Fax: (512) 623-7729

ATTORNEYS FOR THE PLAINTIFFS

NOTICE OF ELECTRONIC FILING

I, **LEAH O'LEARY**, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on February 7, 2018.

/s/ Leah O'Leary
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **LEAH O'LEARY**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served by electronic service on this 7th of February, 2018 addressed to all attorneys of record.

/s/ Leah O'Leary
Assistant Attorney General